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ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

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March 26, 2021

**VIA, ELECTRONIC FILING**The Honorable Jocelyn Boyd,  
Chief Clerk/Executive Director,  
Public Service Commission of South Carolina

- Re:     • Duke Energy Carolinas, LLC’s and Duke Energy Progress, LLC’s 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann. Section 58-41-20(A)
- **Docket No. 2021-89-E (Duke Energy Carolinas, LLC)**
- **Docket No. 2021-90-E (Duke Energy Progress, LLC)**

Ms. Boyd:

In response to Commission Order No. 2021-166, which established a proposed procedural schedule for the above referenced matters, the Southern Environmental Law Center (“SELC”)<sup>1</sup> and Carolinas Clean Energy Business Association (“CCEBA”)(collectively, the “Anticipated Parties”) respectfully submit this request to hold these procedural deadlines in abeyance and allow for a proposed schedule to be submitted to the Commission no later than April 30, 2021.

As outlined by Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC, (“DEP,” and together with DEC, the “Companies”) in their March 26, 2021 request to this Commission, the Parties believe it is necessary to establish an updated procedural schedule that accommodates the requirements set forth in Order No. 2019-881(A) with regard to the completion of an independent technical review of the Companies’ solar integration service charge (“SISC”).

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<sup>1</sup> SELC expects to represent the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy in this proceeding.

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Additionally, the Parties intend to work with the Companies to identify any additional matters currently at issue in the ongoing integrated resource planning dockets (2019-224-E and 2019-225-E) that could also have implications for the matters to be addressed in this proceeding. As required by statute, a significant number of matters to be addressed in avoided cost proceedings are predicated on the information and conclusions within a utility's integrated resource plan. Therefore, the Parties anticipate that some accommodation may be needed to reconcile the procedural schedules in these respective proceedings.

Accordingly, the Parties request the Commission hold the procedural deadlines in these proceedings in abeyance and allow the interested parties to these dockets to propose a procedural schedule, as well as any other pertinent recommendations for consideration by this Commission, no later than April 30, 2021.

Respectfully Submitted,

/s/Richard L. Whitt

Richard L. Whitt,

*As Counsel for Carolinas Clean Energy  
Business Association.*

/s/Kate Lee Mixson

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cc: All parties of record in Dockets 2021-89-E and 2021-90-E, *via electronic mail*